

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

FIVE (5) VERIZON WIRELESS CARDS
VALUED AT \$500.00 IN U.S. CURRENCY,
and NINETEEN (19) AMEX BUSINESS
GIFT CARDS VALUED AT \$39,052.06 IN
U.S. CURRENCY,

Defendants.

NO. C16-0373

APPLICATION TO ISSUE WARRANT
OF ARREST IN REM

COMES NOW, the United States of America, by and through Annette L. Hayes,
United States Attorney for the Western District of Washington, and Matthew H. Thomas,
Assistant United States Attorney for said District, respectfully requests that this
Honorable Court issue the attached Warrant of Arrest in Rem pursuant to Rule G(3)(b)(ii)
of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture
Actions of the Federal Rules of Civil Procedure. In support of its application, the
United States says the following:

On March 11, 2016, the United States filed a complaint for civil forfeiture in rem
in the above-referenced case. The complaint seeks the forfeiture of Five (5) Verizon
Wireless Cards Valued at \$500.00 in U.S. Currency, and Nineteen (19) Amex Business
Gift Cards Valued at \$39,052.06 in U.S. Currency, seized from Maziar Rezakhani's

U.S. v. Five (5) Verizon Wireless Cards Valued at \$500.00, *et al.*
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UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
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storage unit located at 688 110th Avenue, NE, Unit #S-3301, Bellevue, Washington, (hereinafter, “the defendant property”).

While the United States seized the plastic gift cards associated with the value behind the cards during the execution of federal search warrants, the value behind the cards, currency, is not presently in the possession, custody or control of the United States and is not presently subject to any judicial restraining order. The value of the cards is in the custody of :

Verizon Wireless

Attn: Legal Compliance

P. O. Box 1001, MC-TXD01613

San Angelo, TX 76902-1001

Service by fax: (888) 667-0028 [or] (325) 949-6916

	Verizon Wireless	Amount
1.	568797 44903420648	\$100.00
2.	117438 44903414101	\$100.00
3.	531188 44903425643	\$100.00
4.	902007 44903421139	\$100.00
5.	836400 44903419197	\$100.00
	TOTAL FUNDS	\$500.00

American Express
 Attn: AMEX Compliance
 43 Butterfield Circle
 El Paso, Texas 79906
 Service by UPS Overnight

	AMEX Business Gift Card	Amount
1.	3790 163839 01914	\$
2.	3790 163835 85238	\$
3.	3790 163834 45276	\$
4.	3790 163837 55641	\$
5.	3790 163838 70515	\$
6.	3790 163833 27052	\$
7.	3790 163826 45272	\$
8.	3790 163828 46243	\$
9.	3790 163827 85235	\$
10.	3790 163823 01918	\$
11.	3790 163824 44387	\$
12.	3790 163825 27058	\$
13.	3790 163820 46240	\$
14.	3790 163821 55645	\$
15.	3790 163822 70519	\$
16.	3790 163829 55648	\$
17.	3790 163817 27055	\$
18.	3790 163818 45279	\$
19.	3790 163819 85232	\$
TOTAL FUNDS		\$39,052.06

U.S. v. Five (5) Verizon Wireless Cards Valued at \$500.00, *et al.*
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1 Supplemental Rule G(3)(b)(ii) provides that if property is subject to forfeiture in a
2 civil forfeiture case, and the property is not in the Government's possession, custody or
3 control and is not subject to a judicial restraining order, the Court, on a finding of
4 probable cause, must issue a warrant to arrest the property.

5 The facts supporting a finding of probable cause to believe that the defendant
6 property is subject to forfeiture are set forth in the affidavit attached to the Complaint.

7 WHEREFORE, the United States respectfully requests that the Court find that
8 there is probable cause to believe that the defendant property is subject to forfeiture, and
9 issue the proposed warrant of arrest in rem directing the Department of Treasury, Internal
10 Revenue Service or its authorized representative to seize the defendant property.

11 DATED this 11th day of March, 2016.

12 Respectfully submitted,

13 ANNETTE L. HAYES
14 United States Attorney

15 s/Matthew H. Thomas
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